



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JEREMY PAUL RYAN,  
  
Defendant.

No. 2:24-cr-00733-GW

I N F O R M A T I O N

[18 U.S.C. § 1349: Conspiracy  
to Commit Bank Fraud; 18 U.S.C.  
§ 1028A(a)(1): Aggravated  
Identity Theft]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1349]

Beginning in or before 2023, and continuing through at  
least June 20, 2024, in Los Angeles County, within the Central  
District of California, and elsewhere, defendant JEREMY PAUL  
RYAN conspired with others to commit bank fraud, in violation of  
Title 18, United States Code, Section 1344. The object of the  
conspiracy was carried out, and to be carried out, in substance,  
as follows: defendant RYAN and his co-conspirators would steal  
victims' bank-issued credit cards and identifying information.  
Defendant RYAN would make counterfeit identity documents in the  
victims' names, but bearing photographs of defendant RYAN and

1 his co-conspirators. Defendant RYAN would impersonate his  
2 victims and apply for credit in their names. Defendant RYAN and  
3 his co-conspirators would make charges on the victims' credit  
4 cards. As a result of this fraud, defendant RYAN and his co-  
5 conspirators defrauded federally-insured financial institutions  
6 including Wells Fargo Bank, Capitol One, Chase, American  
7 Express, Navy Federal Credit Union, and Bank of America.

COUNT TWO

[18 U.S.C. § 1028A(a)(1)]

Beginning in or before 2023, and continuing through at least June 20, 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendant JEREMY PAUL RYAN knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, including the name of victim M.K.M., during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Bank Fraud, as charged in Count One of this Information, knowing that the means of identification belonged to another actual person.

E. MARTIN ESTRADA  
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